

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA

BLACK EMERGENCY RESPONSE  
TEAM, et al.,

*Plaintiffs,*

v.

GENTNER DRUMMOND, in his official  
capacity as Oklahoma Attorney General, et  
al.,

*Defendants.*

Case No. 5:21-CV-1022-G

Hon. Charles B. Goodwin

**PLAINTIFFS’ MOTION FOR SUPPLEMENTAL BRIEFING CONCERNING  
THE OKLAHOMA STATE BOARD OF EDUCATION’S ENFORCEMENT OF  
H.B. 1775**

Plaintiffs Black Emergency Response Team (“BERT”), *et al.*, respectfully request this Court grant Plaintiffs leave to file supplemental briefing concerning the Oklahoma State Board of Education’s enforcement of H.B. 1775. Docs. 211, 212, and 213; *see also* LCvR7.1(h). The information provided in State Defendants’ Response to Plaintiffs’ Notice to Court, Docs. 213, 213-1, raises important concerns regarding Plaintiffs’ Motion for Preliminary Injunction and this Court’s Order granting, in part, and denying, in part, the injunction. Docs. 27, 173. Plaintiffs respectfully request the Court grant Plaintiffs leave to file supplemental briefing addressing these issues. A copy of the proposed supplemental briefing is attached to this motion as Exhibit 1.

Per LCv7.1(j) Plaintiffs have conferred with the State Defendants and University Defendants regarding their position on Plaintiffs' requested relief. Both the State Defendants and University Defendants object to the relief requested.

### **RELIEF REQUESTED**

Plaintiffs respectfully request the Court grant Plaintiffs leave to file supplemental briefing addressing the Oklahoma State Board of Education's recent enforcement of H.B. 1775 ("the Act") because it implicates important concerns relevant to Plaintiffs' Motion for Preliminary Injunction and this Court's Order of Preliminary Injunction. Docs. 27, 173.

Dated: December 11, 2024

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Respectfully submitted,

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### **CERTIFICATE OF SERVICE**

I hereby certify that on December 11, 2024 I electronically filed the foregoing document with the Clerk of Court via the Court's CM/ECF system, which effects service upon all counsel of record.

Respectfully submitted,

/s/ Adam H. Hines

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